

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Application Review**

**Issue Date: DRAFT**

**Region:** Winston-Salem Regional Office  
**County:** Rockingham  
**NC Facility ID:** 7900038  
**Inspector's Name:** Maria Aloyo  
**Date of Last Inspection:** 06/15/2017  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>  <b>Applicant (Facility's Name):</b> Pine Hall Brick Co., Inc.  <b>Facility Address:</b> Pine Hall Brick Co., Inc. 634 Lindsey Bridge Road Madison, NC 27025  <b>SIC:</b> 3251 / Brick And Structural Clay Tile <b>NAICS:</b> 327121 / Brick and Structural Clay Tile Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> <b>Fee Classification: Before:</b> Title V <b>After:</b>				<b>Permit Applicability (this application only)</b>  <b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>			
<b>Contact Data</b>				<b>Application Data</b>			
<b>Facility Contact</b>  Geoffrey Roberson Technical Services Director (336) 548-6007 PO Box 836 Madison, NC 27025	<b>Authorized Contact</b>  Geoffrey Roberson Technical Services Director (336) 548-6007 PO Box 836 Madison, NC 27025	<b>Technical Contact</b>  Geoffrey Roberson Technical Services Director (336) 548-6007 PO Box 836 Madison, NC 27025	<b>Application Number:</b> 7900038.18A <b>Date Received:</b> 03/27/2018 <b>Application Type:</b> Modification <b>Application Schedule:</b> TV-Significant <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 03997/T27 <b>Existing Permit Issue Date:</b> 10/06/2017 <b>Existing Permit Expiration Date:</b> 09/30/2022				
<b>Total Actual emissions in TONS/YEAR:</b>							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2016	5.13	45.02	8.62	144.02	79.01	37.35	23.97 [Hydrogen fluoride (hydrofluori)]
2015	4.68	40.34	7.84	126.91	108.54	29.65	19.06 [Hydrogen fluoride (hydrofluori)]
2014	3.96	34.16	6.43	108.58	92.37	25.22	16.41 [Hydrogen fluoride (hydrofluori)]
2013	3.94	33.85	6.46	100.09	92.30	24.45	15.75 [Hydrogen fluoride (hydrofluori)]
2012	3.97	34.23	6.44	96.45	92.49	26.59	17.50 [Hydrogen fluoride (hydrofluori)]
<b>Review Engineer:</b> Jenny Sheppard  <b>Review Engineer's Signature:</b>					<b>Comments / Recommendations:</b> <b>Issue</b> 03997/T28 <b>Permit Issue Date:</b> DRAFT <b>Permit Expiration Date:</b>		

## 1. Purpose of Application

Pine Hall Brick Company – Madison facility holds Title V Permit No. 03997T27 with an expiration date of September 30, 2022 for a brick manufacturing facility in Madison, Rockingham County, North Carolina. A permit application for a significant modification was received on March 27, 2018. Under the permit application, Pine Hall Brick Company is requesting to modify the 112(j) Case by Case MACT language to allow control device bypass during routine maintenance for the Plant 4 brick kilns.

## 2. Facility Description

Pine Hall Brick Company – Madison Plant operates owns and operates a brick manufacturing facility in Madison, North Carolina. The facility is operating under the existing air permit 03997T27. This permit was issued on October 6, 2017 and is currently scheduled to expire on September 30, 2022.

## 3. Application History

Application submitted March 27, 2018 for significant modification. Application Completeness letter sent April 2, 2018. Email received May 8, 2018 indicating that the Primary Jaw crusher (ID No. 3JC-1) has a typographical error on the capacity (342 tph instead of 324 tph). May 30, 2018 the facility submitted a change for the responsible official and submitted a new Form A on June 5, 2018.

**October 6, 2018** – Renewal issued 03997T27 by Russell Braswell

## 4. Permit Table of Changes/Modifications

Page No.	Section	Changes
	Cover Letter	Updated dates/permit number
3	Equipment List	Correct capacity for the Primary Jaw Crusher
21	2.2 B.4.	Added DLA/bagfilter routine maintenance bypass language
24	General Conditions	Updated general conditions with latest version (5.2)

## 5. Regulatory Review – State Rules

As noted above, the facility is requesting language to allow control device bypass during routine maintenance. The requirement was not included in the originally since the DLA for Plant 4 brick kilns did not require the use of the DLA for compliance. Since then the facility has installed a bagfilter in series with the DLA to control particulate emissions to ensure compliance with the emission limits under 112(j) for Brick Manufactures. The DLA/bagfilter is not required for compliance with other state rules including 15A NCAC 02D .0515, "Particulates from Miscellaneous Industrial Processes," or 15A NCAC 02D .1100, "Control of Toxic Air Pollutants."

The modification is made to add the following additional requirements to the 112(j) Case by Case MACT condition that is contained in the current permit for the tunnel kilns:

### **15A NCAC 2D .1109; CAA 112(j); Case-by-Case MACT for Brick Manufacturers**

#### **Additional Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]**

- j. The Permittee shall maintain a record of each period when the large tunnel kilns are operated while bypassing the DLA (**ID No. 4ES-DLA**) and/or the bagfilter (**ID No. 4ES-BF**) in order to perform routine maintenance. The records shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request, and shall include:
  - i. The start date and start time of the routine maintenance;
  - ii. The stop date and stop time of the routine maintenance;

- iii. A description of the maintenance activities; and,
- iv. The total time the kiln has operated in by-pass, and the total percentage of the operating time the kilns have been operated in bypass for the previous 12-month period.

The Permittee shall be deemed in non-compliance with 15A NCAC 2D .1109 if these records are not maintained or if the percentage of time the kiln operates in bypass exceeds 4% of the annual operating time.

#### **Additional Reporting [15A NCAC 02Q .0508(f)]**

- I. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
  - i. Company name, facility ID number, and address;
  - ii. Statement by the Responsible Official with that official's name, title, and signature certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete;
  - iii. A description of routine maintenance performed while the DLA (**ID No. 4ES-DLA**) and/or the bagfilter (**ID No. 4ES-BF**) were offline and the large tunnel kilns (**ID Nos. 4ES-LKD4.1 and 4ES-LKD4.2**) were operating, including the following:
    - (A) The date and time when the DLA and/or bagfilter were shutdown and restarted.
    - (B) Identification of the number of hours that the kilns operated while the DLA and/or bagfilter were offline.
    - (C) The *total* amount of time (in hours and % of total operating time) that the associated kiln operated during the current semiannual compliance period and during the previous semiannual compliance period.
  - iv. For each deviation from a limitation (emission limit, operating limit, or work practice standard), include the following information:
    - (A) The total operating time of each affected source during the reporting period.
    - (B) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

If there were no deviations from any of the applicable limitations, a statement that there were no deviations during the reporting period.

#### **6. Regulatory Review - Federal Rules (NSPS, NESHAP/MACT, NSR/PSD)**

No federal rules apply to this modification.

#### **7. Facility Wide Air Toxics**

Currently this facility has conditions for 2Q .0711 and 2D .1100, and the addition of the MRR does not affect the limitations contained in these conditions.

#### **8. Facility Emissions Review**

There is no emissions increase associated with this modification.

#### **9. Facility Compliance Status**

The latest inspection for this facility was on June 15, 2017 by Maria Aloyo of the WSRO. Based on the inspection report, the facility was found to be in compliance.

#### **10. Public Notice/EPA and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to

persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected state/local program within 50 miles of the facility.

The following comments were received: **(TO BE COMPLETED AFTER PUBLIC and EPA COMMENT PERIOD.)**

#### **11. Conclusions, Comments, and Recommendations**

A professional engineer's seal was not required for this application.

A consistency determination was not required for this application.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance. **(TO BE COMPLETED AFTER REGIONAL COMMENTS ARE RECEIVED)**

RCO concurs with WSRO's recommendation to issue the renewed air permit. **(TO BE COMPLETED AFTER PUBLIC and EPA COMMENT PERIOD.)**